

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

FREDRIC N. ESHELMAN,

Plaintiff,

v.

TRUE THE VOTE, INC.,

Defendant.

Case No. 4:20-cv-04034

**MOTION FOR LEAVE TO FILE UNDER SEAL PLAINTIFF'S UNREDACTED
EMERGENCY APPLICATION FOR TEMPORARY RESTRAINING ORDER AND
MOTION FOR PRELIMINARY INJUNCTION AND ACCOMPANYING EXHIBITS**

Plaintiff Fredric N. Eshelman ("Plaintiff") files this Motion for Leave to File Under Seal and requests that the Court allow Plaintiff to file his unredacted Application for Temporary Restraining Order and Motion for Preliminary Injunction ("Application") and three accompanying exhibits under seal.

Plaintiff's Application citations to financial account numbers from documents that Defendant True the Vote, Inc. ("Defendant") has designated "Confidential" pursuant to the Protective Order agreed to by the parties and entered by the Court on January 6, 2021. *See* Dkt. 30. Additionally, the Plaintiff's Application attaches as exhibits seventeen (17) documents, some of which were produced by Defendant. Three of these exhibits, Exhibit J, Exhibit K, and Exhibit L, and the Proposed Order attached to the Application, contain confidential financial information like account numbers that, under the Protective Order, obligates Plaintiff to seek an order of the Court permitting the filing of the unredacted Application and these three exhibits under seal. *Id.*

For the foregoing reasons, Plaintiff respectfully asks the Court to grant his motion for leave to file under seal (1) Plaintiff's unredacted Application for Temporary Restraining Order and Motion for Preliminary Injunction, (2) three accompanying exhibits, and (3) Proposed Order.

Dated: January 8, 2021

Respectfully submitted,
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CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of January a true and correct copy of the above foregoing document has been forwarded to counsel of record via ECF and email and on parties to whom counsel has not appeared as follows:

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